

# **EXHIBIT 3**

Volume 1  
Sandra Kirkman

Kirkman vs.  
State of California

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE CENTRAL DISTRICT OF CALIFORNIA  
3  
4       SANDRA KIRKMAN AND CARLOS                   )  
5       ALANIZ, INDIVIDUALLY AND AS                )  
6       SUCCESSORS-IN-INTEREST TO                   )  
7       JOHN ALANIZ, DECEASED,                     )  
8    )  
9                   Plaintiffs,                     )  
10   )  
11       v.   )  
12   )  
13       STATE OF CALIFORNIA; RAMON                 )  
14       SILVA; AND DOES 1-10,                     )  
15       INCLUSIVE,                                    )  
16   )  
17                   Defendants.                     )  
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22                   REMOTE DEPOSITION OF SANDRA KIRKMAN  
23   VOLUME 1

24   Laguna Niguel, California  
25   Wednesday, June 19, 2024

26       Reported by:  
27       DENISE MARLOW  
28       RPR, CSR No. 11631  
29  
30       Job No. 10143231  
31  
32       PAGES 1 - 63

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1 Q. And then how about this woman holding the baby,  
2 who is that?

3 A. That's my daughter Sesile.

4 Q. And who is this gentleman in the back?

5 A. And that's Charlie, his brother, my oldest one.  
6 We call him --

7 Q. I'm sorry. I didn't mean to interrupt you.

8 So you guys call Carlos "Charlie"?

9 A. Yes.

10 Q. Okay. Thank you.

11 And then how about the little girl, who is that?

12 A. That's my little niece.

13 Q. Okay. I do want to get some background  
14 information on John. And, again, this isn't meant to be  
15 rude or anything of that sort. It's just information  
16 that we're entitled to and we need to explore with you.  
17 So, again, if you need any breaks at any time, please  
18 let me know.

19 Now, had John ever been arrested at any time in  
20 his life that you're aware of?

21 A. Not that I know of.

22 Q. Did he ever serve time in jail or prison that  
23 you're aware of?

24 A. Not that I know of.

25 Q. And to your knowledge, did John ever use any

1 drugs or controlled substances?

2 A. No, not that I know of.

3 Q. Did he ever -- excuse me. Did he ever undergo

4 treatment at any drug treatment facilities that you're

5 aware of?

6 A. Not that I know of.

7 Q. What about any alcohol treatment facilities?

8 Has he ever undergone any treatment there?

9 A. Not that I know of.

10 Q. And to your knowledge, did John ever suffer from  
11 any sort of psychological problems?

12 MS. LEAP: Just vague and ambiguous as to  
13 "psychological problems."

14 But you can answer, Sandy.

15 THE WITNESS: Yes.

16 BY MS. REYES:

17 Q. Can you describe, you know, what problems --  
18 what sort of these problems that you had noticed?

19 A. Well, John was in the military, so he struggled  
20 when he came back.

21 Q. And when you say he struggled when he came back,  
22 what do you mean?

23 A. He had a hard time getting back into society,  
24 trying to find a job. He had a lot of, you know, trying  
25 to fit back in like a lot of the veterans do.

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## REPORTER'S CERTIFICATION

I, Denise Marlow, Certified Shorthand Reporter  
in and for the State of California, do hereby certify:

That the witness named in the foregoing  
deposition was, before the commencement of the  
deposition, duly administered an oath in accordance  
with the Code of Civil Procedure Section 2094; that  
the testimony and proceedings were reported  
stenographically by me and later transcribed through  
computer-aided transcription under my direction and  
supervision; that the foregoing is a true record of the  
testimony and proceedings taken at that time.

IN WITNESS WHEREOF, I have hereunto subscribed  
my name this 3rd day of July, 2024.

*Denise Marlow*

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Denise Marlow, CSR No. 11631